

Shana Lee McCart-Pollak
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<div style="border: 1px solid black; padding: 5px; margin: 5px auto; width: 100px;"> APRIL 17, 2025 </div>	
CLERK, U.S. DISTRICT COURT DISTRICT OF NEVADA /s/ RJDG	
BY: _____	DEPUTY

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

SHANA LEE MCCART-POLLAK,
Plaintiff,

Case No: 2:20-cv-01624-GMN-NJK

vs.

**JOINT STIPULATION AND ORDER TO
STAY AND/OR CONTINUE THE DUE
DATE OF THE JOINT PROPOSED
PRETRIAL ORDER [ECF No. 291, 296]**

ON DEMAND DIRECT RESPONSE LLC,
Delaware company, ON DEMAND DIRECT
RESPONSE III LLC, Delaware company;
BRETT SAEVITZON, individual; CRAIG
SHANDLER, individual; JEFFREY MILLER,
individual; MARK MEYERS, individual;
DOES I-X; ROE BUSINESS ENTITIES I-
X;

Defendants

Comes now, Plaintiff Shana Lee McCart-Pollak ("Pollak") in proper person;
Defendant Brett Saevitzon ("Saevitzon"); Defendant Craig Shandler ("Shandler"), by and
through their counsel, David K. Dorenfeld, Esq., of Dorenfeldlaw, inc., hereby submit this
JOINT STIPULATION AND ORDER TO STAY AND/OR CONTINUE THE DUE DATE OF
THE JOINT PROPOSED PRETRIAL ORDER [ECF. No. 291, 296] pursuant to LR 16-
3(b) using form provided in LR 16-4, currently due April 28, 2025, to a later date this
Honorable Court may allow.

This stipulation and order is being executed due to multiple Motions that are
pending in the Court, which have a direct impact on the case. The Pending Motions are

1 1) Pollak has requested a "Show Cause" Hearing [Dkt 302]; 2) Pollak has requested A
2 "Show Cause" Hearing and Dispositive Sanctions against Brett Saevitzon and Sanctions
3 against His Counsel [Dkt 300 and 301]; and 3) Pollak has requested Dispositive Sanctions
4 against Craig Shandler and Sanctions against His Counsel [Dkt 303].
5

6 GOOD CAUSE

7 There is "Good Cause" for the Court to determine the pending motions, as it is
8 consistent with Rule 1 that the rules "shall be construed and administered to secure the
9 just, speedy, and inexpensive determination of every action": The Court could potentially
10 determine that case dispositive sanctions are warranted; which would negate the
11 need for a pretrial order, since there would be NO trial.
12

13 At this juncture, for the Court to pause and to determine the pending Motions,
14 WOULD NOT PREJUDICE any of the Parties, as a trial date has not been set. This
15 would save the Parties costs, as well as, the parties and the Court's time. Further,
16 this would allow the parties to focus their time on fully briefing the Motions (Response and
17 Reply) for the Court.
18

19 The Parties respectfully requests that the Court stay and/or continue the date the
20 pretrial order is due, while the parties brief and the Court considers the pending motions.
21 the Parties wish to avoid the cost and time in preparing the pretrial report pending
22 resolution of the issues.
23

24 This is the second request. The first request was due to a medical emergency. The
25 parties in this matter respectfully request this Honorable Court to stay or extend out the
26 due date of the Joint Proposed Pretrial Order currently due on April 28, 2025, to a later
27 date this Honorable Court may allow.
28

1 Dated this 17th day of April, 2025

2 

3 SIGNATURE

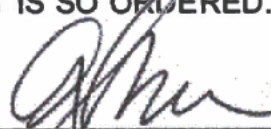
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9 Pro Se

10 

11 David K. Dorenfeld (Cal Bar No. 145056;
12 Pro Hac Vici)
13 DorenfeldLaw, Inc.
14 30101 Agoura Court, Suite 210
15 Agoura Hills, California 91301
16 Tel: (818) 865-4000
17 Fax: (818) 865-4010
18 Email: david@dorenfeldlaw.com
19 Attorney for Defendants, Brett Saevitzon
20 and Craig Shandler

21 Accordingly, the Parties shall file a Joint Pretrial Order 90 days from the date
22 of this Order.

23 IT IS SO ORDERED.

24 

25 Gloria M. Navarro
26 United States District Judge

27 DATED: April 18, 2025.

CERTIFICATE OF SERVICE

I, Shana Lee McCart-Pollak, declares as follows, I am over the age of 18 years:

My address is: 1104 North Woodridge Lane
Liberty, MO 64068
(702) 439-2263

On April 17, 2025, I served the foregoing document(s) described as:

**JOINT STIPULATION AND ORDER TO STAY AND/OR CONTINUE THE DUE DATE
OF THE JOINT PROPOSED PRETRIAL ORDER [ECF NO. 291, 296]**

I hereby certify that on the 17th day of April 2025, a true and complete copy of the foregoing was served on counsel of record by mail to the addresses indicated below:

Dorenfeld Law
30101 Agoura Court, Suite 210
Agoura Hills, California 91301

I declare under penalty of perjury that the foregoing is true and correct.


Shana Lee McCart-Pollak